



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2405

JUL 29 1991

Ref: 8HWM-FF

Frazer Lockhart  
Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, Colorado 80402-0928

RE: Operable Unit 1, 881 Hillside  
IM/IRA.

Dear Mr. Lockhart,

EPA formally requested (April, 23, 1991) that DOE respond to EPA comments regarding the OU 1 IM/IRA Implementation Plan prior to construction of the French Drain. The required response includes preparation of additional documents which will require time to review. As DOE is planning an early start date (summer, 1991) for the French Drain construction and has a milestone date of August 5, 1991, for the beginning of testing, DOE's response to EPA's comments must be submitted by August 12, 1991.

Key concerns identified in the April 23, 1991 letter are as follows:

- treatment design plans, testing schedules and testing results for the UV/HP system must be submitted for review;
- procedures for meeting the  $10^{-6}$  cm/s hydraulic conductivity must be submitted;
- contaminant testing procedures and disposition of construction soils and soils excavated from IHSSs must be identified;
- potential realignment of the french drain and subsequent geotechnical testing must be identified and
- any additional or altered field engineering procedure plans as identified in the IM/IRA Implementation Plan must be identified.

Additionally, EPA requests information on the status of the  
ADMIN RECORD

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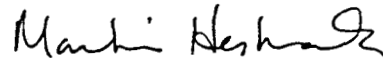
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following items related to french drain construction and startup of the treatment system:

- testing of the ion exchange system to determine its ability to remove radionuclides from the waste stream;
- development of operation and maintenance plans for the treatment system;
- development of a sampling plan for the treated water;
- development of a Quality Assurance and Quality Control Plan for the treatment system and
- development of a storage or treatment plan for water collected in the French Drain during its construction.

EPA is interested in the status of these items as completion of these tasks will help avoid complications during the construction and treatment testing phases. Please contact Patricia Corbetta at (303) 294-1071 to discuss these issues.

Sincerely,



Martin Hestmark, Manager  
Rocky Flats Project

cc:

Patricia Corbetta, EPA  
Gary Baughman, CDH  
Noreen Matsuura, CDH  
Tom Olsen, DOE  
Jim Koffer, EG&G  
Cindy Gee, EG&G  
Terry Smith, PRC